

## CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

1111 JACKSON STREET, ROOM 6040

OAKLAND 94607

Phone: Area Code 415  
464-1255July 31, 1989  
File No. 2199.9079

Ms. Barbara Ransom  
Leslie Salt Company  
7200 Central Avenue  
Newark, California 94560

Subject: Evaluation of the Options for the Discharge of Bittern

Dear Ms. Ransom:

We have reviewed the two reports dated May 12, 1989 entitled "Evaluation of the Options for the Discharge of Bittern" and "Study Plan for the Evaluation of the Discharge of Leslie Salt Bittern Into the EBDA Discharge Line". We have two primary concerns about these reports, which contain several viable approaches to the problem of bittern disposal.

The first concern we have is that the bittern disposal capacity of any one option is roughly equivalent to the annual production of bittern. This perhaps does not have to be the case with every option, for instance the ocean disposal option, but each was sized in this way in this report. The basis for our concern with this capacity limitation is that bittern storage has been significantly expanded in recent years at the Leslie Salt facilities, and therefore waters of the State have been essentially filled with a waste material.

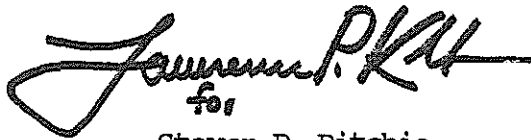
While we recognize that some bittern storage capacity is a necessary aspect of solar salt production, clearly the current situation does not reflect "business as usual" or a normal production situation, but the effects of inadequate disposal or sales capacity of the bittern. It is the position of the staff of the Regional Board that bittern storage should be reduced to the minimum practical for the maintenance of solar salt production, and this clearly requires a greater disposal capacity than that equivalent to annual bittern production. Therefore, it may be necessary to explore two or more bittern disposal options simultaneously, if the disposal capacity of any one of the preferred options can not be expanded significantly.

Secondly, the proposed time schedule for the study plan seems overly conservative at 18 months, particularly the Evaluation Phase which is programmed for 12 months. We suggest a period of six months for this phase, including 3 months of winter or wet weather and 3 months of dry weather to assess seasonal conditions. Four months for data analysis and

report preparation also seems excessive, and may be contracted to two or three months. Certainly there are always unforeseen delays in a schedule of this type, but we would like to encourage rapid progress.

Please contact Dale Bowyer at 415/464-4267 to discuss this letter or arrange a meeting for further discussion.

Sincerely,

A handwritten signature in dark ink, appearing to read "Steven R. Ritchie". The signature is stylized with a large, sweeping initial "S" and a long horizontal line extending to the right. Below the signature, the word "for" is written in a small, handwritten font.

Steven R. Ritchie  
Executive Officer